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July 15, 2015

Ms. Jennifer Sutter
Voluntary Cleanup and Portland Harbor Section
Oregon Department of Environmental Quality
700 NE Multnomah St.
Suite 600
Portland, OR 97232

**Subject: Second Quarter 2015 Progress Report for EVRAZ Oregon Steel Facility in
Portland, Oregon WPMVC-NWR-00-10**

Dear Ms. Sutter:

On behalf of EVRAZ Oregon Steel (EOS), Integral Consulting submits to the Oregon Department of Environmental Quality (DEQ) this Second Quarter 2015 Progress Report for the EOS facility in Portland, Oregon, located at 14400 N. Rivergate Blvd. This report is submitted in accordance with Section II.H of the June 2000 Voluntary Remediation Investigation Source Control Measure Agreement (Voluntary Agreement) for the EOS facility. This report documents and discusses the project activities from April 1 through June 30, 2015 (second quarter of 2015). In addition, this report describes activities planned for the third quarter of 2015.

Actions Completed During the Second Quarter 2015

Stormwater Source Control

On April 15, 2015, EOS submitted a memorandum to DEQ summarizing workhorse pump installation, basin sediment cleanout and October 14, 2014 Northern Outfall (003) stormwater sample results. EOS met with DEQ on June 23, 2015 to discuss the current system configuration, sample results, and a potential path forward on stormwater source control. DEQ indicated that additional stormwater treatment system improvements may not be necessary. However, additional sampling will be needed to determine if the current treatment system meets the objectives of the Voluntary Agreement.

A hydraulic analysis of the stormwater system was completed during the second quarter of 2015. The hydraulic analysis is a refinement over previous hydrologic modeling of the stormwater system, and will be used to size future system improvements if required under the Voluntary Agreement.

Sediment depths in the stormwater clarification basin cells were measured monthly during the second quarter of 2015. Average sediment thickness remains less than one foot in each of the basin cells.

Riverbank Source Control

Design and Implementation Activities:

On May 20, 2015, EOS submitted a plan to manage berm and beach soil at upland locations on the facility. DEQ responded on May 26, 2015 with conditional approval and minor comments on the plan.

On June 18, 2015, EOS submitted a response to DEQ and EPA comments on the 100% design report, and a response to DEQ comments on the upland soil management plan. DEQ issued final approval for both the 100% design and the soil management plan on June 22, 2015.

EOS continued construction preparation in the second quarter of 2015 including contractor selection and contract negotiation. Strider Construction Company was the selected contractor and a pre-construction meeting with DEQ was held on June 17, 2015.

Groundwater Source Control

Three beach and three riverbank wells were sampled during the first quarter of 2015 in the vicinity of a 2012 make-up river water line leak that was repaired in March 2013. The groundwater monitoring report was drafted during the second quarter of 2015.

Upland Remedial Action / Risk Assessment

Progress was made incorporating revisions into the revised Upland Human Health Risk Assessment (HHRA) during the second quarter of 2015.

Problems Experienced During the Second Quarter 2015

No significant problems were encountered during the second quarter of 2015.

Actions Scheduled for the Third Quarter 2015

EOS is planning the following source control and upland closure-related activities for the third quarter of 2015:

Stormwater Source Control

- Monitoring of sediment depth accumulation in the stormwater clarification basin
- The interim monitoring and maintenance plan for the stormwater clarification basin will be revised based on DEQ comments and communications, and will be submitted to DEQ.

Riverbank Source Control

- Construction contractor mobilization, site preparation, soil removal and bank stabilization activities.

Groundwater Source Control

- Submittal of the letter report to DEQ providing the results of the January 2015 sampling event, and discuss next steps for completing a no further action determination.

Upland Remedial Action/Risk Assessment/Feasibility Study

- Call with DEQ to discuss the outstanding DEQ comment
- Finalize revisions to the HHRA and submit to DEQ.

If you have any questions regarding this report, please contact me at (503) 943-3629 or Linda Baker at (206) 957-0314.

Sincerely,



Craig Heimbucher, P.E.
Project Manager

cc: Drew Gilpin and Debbie Deetz Silva – EOS
Joan Snyder – Stoel Rives
Loren Dunn – Riddell Williams
Linda Baker – Integral Consulting
Eva DeMaria, Sean Sheldrake - EPA
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